



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

958240

REPLY TO THE ATTENTION OF:

SR-6J

May 29, 2020

Mr. Wilmer Reyes, Project Coordinator
ViacomCBS
20 Stanwix St.
Pittsburgh, PA 15222

Re: Review of the Remedial Design/Remedial Action Work Plan - Health and Safety Plans,
New Jersey Zinc/Mobil Chemical Site, DePue, Illinois

Dear Mr. Reyes,

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Health and Safety Plans within the document entitled: *Remedial Design/Remedial Action Work Plan (RD/RA WP)* for the New Jersey Zinc/Mobil Chemical Corporation Site, dated April 2020. Comments on the RD/RA Work Plan Health and Safety Plans (Appendix C and Attachment 1) are provided in Attachment 1. Additional comments on the Quality Assurance Project Plan will be submitted under separate cover.

If you have any questions or wish to discuss any of the comments, please do not hesitate to contact me at 312-886-6551.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Rolfes", is positioned below the word "Sincerely,".

Sarah Rolfes
Remedial Project Manager

cc: Charlene Falco, Illinois EPA

**Attachment 1 – Comments on the Remedial Design/Remedial Action Work Plan
Health and Safety Plans**

Specific Comments – Appendix C TetraTech Site-Specific Health and Safety Plan

1. The Health and Safety Plan includes one mention of working near heavy equipment. Please review and include additional information throughout the Plan, as appropriate.
2. Please update the plan to include the names of staff currently working on the site.
3. Responsible Persons - The Site Safety Coordinator (SSC) is not identified by name in the HASP (shown as “TBD”). The SSC should be identified (with contact information) prior to start of work.
4. Training - In the training section (Page 4), the box for “8-Hour Supervisor Training” is not checked. Anyone on site serving in a supervisory capacity should receive the additional training.
5. Site Control - The HASP should include a prohibition of eating, drinking, smoking, chewing gum or tobacco, and applying cosmetics in all Exclusion Zones.
6. Emergency Plan - The review copy does not include a map of the route to the nearest hospital. This should be added to the HASP prior to start of work.
7. COVID-19 Precautions - The documents provided reasonably address the recommendations of the OSHA “COVID-19 Guidance for the Construction Workforce” (OSHA 4000) and other federal guidance, with the following exception regarding to symptoms.
 - a. The CDC has revised the list of “official” COVID-19 symptoms as follows: Cough, Shortness of breath or difficulty breathing, Fever, Chills, Muscle pain, Sore throat, and New loss of taste or smell. Any references to symptoms in the documents should be revised accordingly.

Specific Comments – Attachment 1 ENTACT Site-Specific Health and Safety Plan

1. Responsible Persons - The on-site Health and Safety Officer (HSO) is not identified by name in the HASP (shown as “TBD”). The HSO should be identified (with contact information) prior to starting work.
2. Site Control - The HASP does not address the use of the Buddy System. The Buddy System should be employed in all Exclusion Zones [1910.120 (d)(3)].
3. COVID-19 Precautions - The documents provided reasonably address the recommendations of the OSHA “COVID-19 Guidance for the Construction Workforce” (OSHA 4000) and other federal guidance, with the following exception regarding to symptoms.
 - a. The CDC has revised the list of “official” COVID-19 symptoms as follows: Cough, Shortness of breath or difficulty breathing, Fever, Chills, Muscle pain, Sore throat, and New loss of taste or smell. Any references to symptoms in the documents should be revised accordingly.
4. Emergency Contact List – Please add the EPA Region 5 Spill Line (312-353-2318).
5. Section 4.2.1.7 – Additional appendices note the use of a private utility locate. Please update this section if one will be utilized on the site prior to remediation.

**Attachment 1 – Comments on the Remedial Design/Remedial Action Work Plan
Health and Safety Plans**

6. Section 5.3 – Emergency (911) services should be notified immediately, when appropriate. Please update this section accordingly.
7. Section 5.6 – Please update this section to indicate the fire department will be notified by calling 911 (or the appropriate emergency number).
8. Section 5.0 – A section regarding gas line breaks/strikes and the required response should be added to the ERP.
9. Section 5.8 – Please update this section to reference the emergency phone list.
10. Section 5.12.1 – This section should be updated to reference who from each organization will be notified and when.
11. Section 7.0 – Please clarify if total particulates or particulate matter samples will be collected.
12. Section 7.1 –
 - a. Please clarify if the purpose of the dust monitoring is for worker exposure only and if so, will there be separate air monitoring for residential exposure.
 - b. Additional appendices/attachments indicate monitors will be placed at both a downwind location and near an entrance. This plan does not include this level of detail and it should provide them or reference the appendix/attachment that includes the information.
 - c. Please provide the Standard Operating Procedures for the air monitoring and equipment use.
 - d. According to this plan, ENTACT will be conducting the air monitoring as opposed to TetraTech. Provide additional information on how this data will tie into data management.
 - e. Additional appendices/attachments indicate that DustTracks will be utilized on-site. Section 7.1 does not include the usage of DustTracks. Please update accordingly.
 - f. Paragraph 3 indicates that TWA calculations will be conducted at least twice a day. How will actions to reduce dust be implemented if checks are only being conducted twice per day.
13. Attachment K – Please update this section to indicate who should be called (i.e., NRC, Illinois EPA, US EPA, etc.).